

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WILLIAM ZHANG, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

BRPROTOCOL FOUNDATION, EYAL
HERTZOG, YEHUDA LEVI, GUY BEMARTZI,
and GALIA BENARTZI,

Defendants.

Case No. 1:20-cv-02810-AKH

Honorable Alvin J. Hellerstein

**[PROPOSED] ORDER APPOINTING LEAD PLAINTIFF
AND APPROVING SELECTION OF CO-LEAD COUNSEL**

On this 20th day of August 2020, the Court considered Timothy C. Holsworth's Motion for Appointment as Lead Plaintiff and Approval of Selection of Co-Lead Counsel in the above-captioned action pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 77z-1(a)(3)(B). Having considered the Motion, and the materials submitted in support thereof, the Motion is **GRANTED**.

IT IS HEREBY ORDERED THAT:

1. Timothy C. Holsworth is appointed Lead Plaintiff in the above-captioned action.
2. The Court designates the law firms Roche Cyrilnik Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel in this action.
3. Co-Lead Counsel shall be generally responsible for coordinating activities during pretrial proceedings and shall:
 - a. Determine and present (in briefs, oral argument, or other fashion as may be appropriate, personally or by a designee) to the Court and opposing parties the

position of Lead Plaintiff and the proposed class on all matters arising during pretrial proceedings; taking care to do so in an efficient and economical manner, avoiding duplication of services; (/s/ AKH)

- b. Coordinate the conduct of discovery on behalf of Lead Plaintiff and the proposed class consistent with the requirements of Rule 26 of the Federal Rule of Civil Procedure, including preparation of interrogatories and requests for production of documents and the examination of witnesses in depositions;
- c. Conduct settlement negotiations on behalf of Lead Plaintiff and the proposed class;
- d. Enter into stipulations with opposing counsel as necessary for the conduct of the litigation;
- e. Prepare the case for and conduct trial; and
- f. Perform such other duties as may be incidental to the proper coordination of pretrial and trial activities or authorized by future order of the Court.

4. ~~All securities class actions raising similar claims subsequently filed in or transferred to the United States District Court for the Southern District of New York shall be consolidated into this action, and this Order shall apply to every such action, absent any further order of the Court.~~ Issues of consolidation and treatment of future-filed cases will be dealt with in future orders. (/s/ AKH)

Dated: August 20, 2020

/s/ Alvin K. Hellerstein
Honorable Alvin H. Hellerstein
United States District Judge